

**Federal Defenders
OF NEW YORK, INC.**

Southern District
81 Main Street, Suite 300
White Plains, N.Y. 10601-4150
948-5109

David E. Patton
*Executive Director
and Attorney-in-Chief*

VIA ECF & EMAIL

The Honorable Philip M. Halpern
United States District Judge
Southern District of New York
300 Quarropas Street,
White Plains, NY 10601

Application granted.

The Clerk of Court is respectfully directed to terminate the motion sequence pending at Doc. 124.

SO ORDERED.



Philip M. Halpern
United States District Judge

Dated: White Plains, New York
December 19, 2023

Re: *United States v. Errol Alveranga & Dona Taylor-Alveranga, 23-cr-211-1, 2*

Dear Honorable Judge Halpern:

I write to respectfully request that my client, Dona Taylor-Alveranga, and her husband and co-defendant, Errol Alveranga, be permitted to move to Winston-Salem, North Carolina to reside with my client's son. Mr. Alveranga's counsel, James Neuman joins in this request.

Ms. Taylor-Alveranga and Mr. Alveranga made their initial appearance on May 11, 2022, before the Honorable Andrew E. Krause and were released on conditions. They have been compliant with their conditions since their release.

Both my client and her husband suffer from a host of medical issues. These include conditions that affect their mobility. They currently reside in a second-floor apartment and in recent months they have both had difficulty utilizing the stairs. They recently were served with an eviction notice as they can no longer afford to pay their rent. My client's son, Adrian Clark, wishes to have them come reside with him as they can not afford to rent another location and he can help take care of them and address their medical needs. He resides in Winston-Salem, North Carolina.

I have spoken with Ms. Taylor-Alveranga and Mr. Alveranga's Pre-trial Officer, Shannon Finneran. She has had an opportunity to speak to Mr. Clark and she has no objection to this request. If the Court were to grant this motion, Ms. Finneran would contact Pre-Trial Services in the Middle District of North Carolina to arrange for courtesy supervision. She would continue to supervise them here until such supervision could be arranged and until they move. I have also contacted the Government, through Assistant United States Attorney Steven Kochevar, who has no objection to this request.

Thank you for your time and consideration of this matter.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Elizabeth K. Quinn', with a long horizontal flourish extending to the right.

Elizabeth K. Quinn
Assistant Federal Defender

cc: Steven Kochevar, AUSA
Shannon Finneran, PTO
James Neuman, Counsel for Errol Alveranga